



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-164

**SENT BY CERTIFIED MAIL RETURN RECEIPT REQUESTED**

John Wasniewski, Complex Manager  
Timber Products Co. Medford  
25 East McAndrews Road  
Medford, Oregon 97501

Dear Mr. Wasniewski:

The U.S. Environmental Protection Agency, Region 10, based on information currently available, has determined that the Timber Products Co. Medford facility located at 25 East McAndrews Road in Medford, Oregon (the "Facility") has not submitted a Toxics Release Inventory ("TRI") Form R report ("Form R") or Form A certification statement ("Form A") for any chemicals for calendar year 2009. TRI reports for calendar year 2009 were due on or before July 1, 2010.

Timber Products Co. Medford reported to TRI for formaldehyde and methanol for calendar year 2008. Most facilities that report to TRI are fairly consistent in their production process from year to year. Consequently, most facilities usually report to TRI each year for the same chemicals unless a facility has closed, undergone a major change in its manufacturing process, or otherwise dropped below a TRI reporting threshold.

Failure to report to TRI for calendar year 2009 by the July 1, 2010, deadline is a violation of Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 ("EPCRA"), 42 U.S.C. § 11023, and the regulations promulgated at 40 C.F.R. Part 372. The purpose of this letter and the enclosed request for information is to fully determine compliance by Timber Products Co. Medford with the TRI reporting requirements at 40 C.F.R. Part 372.

You are entitled to assert a claim of business confidentiality, covering all or any of the requested information, in the manner described at 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth at 40 C.F.R. Part 2, Subpart B. Unless a confidentiality claim is asserted at the time the required information is provided, EPA may make this information available to the public without further notice to you.

Your response to this request for information should be signed by a responsible corporate official and include a statement asserting that the information provided is accurate and complete. Please respond to the enclosed information request within twenty (20) days of your receipt of this letter to:

Graham Kirn  
U.S. EPA, Region 10  
1200 6<sup>th</sup> Avenue, Suite 900, MS OCE-164  
Seattle, Washington 98101  
kirn.graham@epa.gov

If you have any questions regarding this request, you should contact this office prior to the deadline specified above. Please direct questions to Graham Kirn at (206) 553-1603 or kirn.graham@epa.gov.

Sincerely,

Edward J. Kowalski  
Director

Enclosure

cc: John Emery,  
Timber Product Co. Medford

**EPCRA Request for Information**  
**Timber Products Co. Medford**  
**25 East McAndrews Road, Medford, Oregon 97501 (the “Facility”)**

Definitions: The definitions provided at 40 C.F.R. §372.3 shall apply to the questions posed in this Request for Information.

1. Provide copies of all Toxics Release Inventory Forms (Form R or Form A) that were submitted to EPA for calendar year 2009 by the Facility, if any, pursuant to 40 C.F.R. §372.
2. If the Facility shut down manufacturing operations, reduced or changed chemical usage, reduced the number of employee hours worked, or otherwise changed manufacturing or processing operations in such a manner that the Facility was not required to report to TRI for calendar year 2009, describe the change in Facility operations and how the Facility determined that it was not required to report to TRI for calendar year 2009.
3. Provide all Standard Industrial Classification (SIC) Codes and North American Industrial Classification System (NAICS) Codes under which the Facility conducted business in 2009.
4. Provide the number of full time employees that worked at or directly for the Facility during calendar year 2009, including operational staff, administrative staff, contractors, dedicated sales staff, company drivers, and off-site direct corporate support.
5. Provide a description of the production process at the Facility from receiving of raw materials to the final product(s) produced (include any industrial process equipment if applicable), and include a current overall process diagram for the Facility.
6. Provide a list of all EPCRA Section 313 chemicals (complete list available at <http://www.epa.gov/tri/trichemicals/index.htm>) manufactured, processed, or otherwise used at the Facility in quantities greater than the applicable TRI reporting threshold during calendar year 2009. For each chemical on the list, indicate how many pounds of the EPCRA Section 313 chemical was manufactured, processed, or otherwise used at the Facility during calendar year 2009, provide threshold and release calculations (including any analytical data, sampling data, or emission factors used) for each chemical, and provide the maximum inventory quantity in pounds stored on site at the Facility in calendar year 2009.
7. Provide copies of all purchasing and inventory records, recycling records, treatment records, and offsite transfer records for calendar year 2009 for all chemicals listed in response to Question 6.
8. Provide copies of all Material Safety Data Sheets for any chemicals used at the Facility during calendar year 2009 that contain an EPCRA Section 313 chemical.